IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

In re Dealer Management Systems Antitrust Litigation, MDL 2817

No. 1:18-CV-864

This filing relates to:

Hon. Robert M. Dow, Jr.

Motor Vehicle Software Corp. v. CDK Global, LLC, et al., Case No. 1:18-cv-865 (N.D. Ill.)

Magistrate Judge Jeffrey T. Gilbert

DEFENDANT COMPUTERIZED VEHICLE REGISTRATION'S MOTION FOR A STAY PENDING RESOLUTION OF THE MOTION TO DISMISS PLAINTIFF'S SECOND AMENDED COMPLAINT

Defendant Computerized Vehicle Registration ("CVR") hereby moves, pursuant to the authorities cited in the accompanying memorandum of law, for an order staying further proceedings as to CVR in the action *Motor Vehicle Software Corp. v. CDK Global, LLC, et al.*, Case No. 1:18-cv-865, pending the resolution of CVR's motion to dismiss the Second Amended Complaint. Plaintiff Motor Vehicle Services Corporation ("MVSC") did not serve CVR with any discovery until August 30, 2018, only a little over a month before the deadline for the substantial completion of document discovery under the Court's Case Management Order (MDL Dkt. 166). Moreover, CVR's pending motion to dismiss (MDL Dkt. 46) advances substantial arguments and follows a complete dismissal of CVR from the prior complaint. Under these circumstances and in the interest of efficiency and judicial economy, it is appropriate to stay further proceedings, including discovery, until the Court resolves CVR's motion to dismiss.

In support of this motion to stay, CVR incorporates by reference the memorandum of law filed herewith, any reply memorandum that CVR may file, and any oral argument that the Court may allow at a hearing on the motion.

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Dated: September 24, 2018

Respectfully submitted,

/s/ Britt M. Miller
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CERTIFICATE OF SERVICE

I, Britt M. Miller, an attorney, hereby certify that on September 24, 2018, I caused a true and correct copy of the foregoing MOTION FOR A STAY PENDING RESOLUTION OF THE MOTION TO DISMISS PLAINTIFF'S SECOND AMENDED COMPLAINT and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Britt M. Miller

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